



November 15, 2024

Via ECF

Hon. Justin T. Quinn, U.S.M.J.
District of New Jersey
402 E State Street
Trenton, New Jersey 08609

**Re: *1735 Jersey Ave LLC v. Luxe Living Design, LLC*
Case No. 3:24-cv-06175**

***1735 Jersey Ave LLC v. Luxe Living Design, LLC et al.*
Case No. 3:24-cv-06168**

Dear Magistrate Judge Quinn,

I am an attorney with the law firm of Twersky PLLC, counsel for Defendant Luxe Living Design, LLC (“Defendant” or “Tenant”) in the captioned matter. I respectfully submit this letter in response to Plaintiff 1735 Ave LLC’s (“Plaintiff” or “Landlord”) Letter filed on November 15, 2024 (“Letter”), D.E. 38.¹

Though in Plaintiff’s Letter it claims that Defendant is in violation of the Court’s Order, this is false. On or about November 1, 2024, Defendant paid October rent in the amount of \$165,000.00. Defendant appraised the Court of this payment in Defendant’s Status Letter submitted on November 1, 2024. *See* Status Letter, D.E. 34. Then, on or about November 7, 2024, the Court ordered that “Defendants shall pay monthly rent in the amount of \$224,000.00. The monthly installments are due on the 7th of each month.” *See* Text Order, D.E. 35. In the Text Order, the Court ordered that going forward, the Defendant must pay rent in the amount of \$224,000.00, and also allowed for Defendant to pay November’s rent by November 12, 2024. *See* Text Order. D.E. 35.

The Text Order *did not order Defendant to retroactively pay* \$224,000.00 for any months passed. Since October rent was already paid prior to the Text Order being entered, it is clear that Defendant was not obligated to pay any more for the October rent payment. Thereafter, on or about November 12, 2024, Defendant paid the November rent, in the amount of \$224,000.00 pursuant to the Text Order. Accordingly, Defendant is in compliance with the Text Order.

¹ The Docket Entries noted in this letter are from Case No. 3:24-cv-06168.

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If the Court requires additional briefing on this matter, in particular to address rent in arrears, Defendant requests a briefing schedule be issued.

Thank you in advance for Your Honor's understanding.

Respectfully yours,



Aaron Twersky, Esq.

cc: All Counsel (via ECF)